

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**SYREETA REDD,**

**Plaintiff,**

**v.**

**Civil Action No. 3:12-cv-00737**

**EMPOWERMENT CLINICAL &  
CONSULTING SERVICES, LLC,  
RUDI JACKSON, AUDREY CAMPBELL  
and BRALEY & THOMPSON, INC.,**

**Defendants**

**REQUEST FOR ENTRY OF DEFAULT**

1. Braley & Thompson, Inc. ("Braley"), by counsel, respectfully requests that the Clerk of the United States District Court for the Eastern District of Virginia enter default against Defendants, Empowerment Clinical & Consulting Services, LLC, Rudi Jackson and Audrey Campbell (collectively the "Cross-Claim Defendants"), due to their failure to file responsive pleadings to Braley's Cross-Claim (Doc. No. 40) or otherwise defend in this matter.

2. An affidavit with respect to the default is attached hereto as **Exhibit A**.

DATED: November 12, 2013

BRALEY & THOMPSON, INC.

**By Spilman Thomas & Battle, PLLC**

/s/ Carrie M. Harris

King F. Tower (VSB #38767)

Carrie M. Harris (VSB #76817)

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**Defendants.**

**CERTIFICATE OF SERVICE**

I, Carrie M. Harris, hereby certify that on November 12, 2013, I electronically filed the foregoing **Request for Entry of Default** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel and parties of record, addressed as follows:

Tim Schulte, Esquire  
Blackwell N. Shelley, Jr., Esquire  
Lauren E. Fisher, Esquire  
Shelley & Schulte, P.C.  
2020 Monument Avenue, First Floor  
Richmond, VA 23220  
*Counsel for Plaintiff*

Rudi Jackson  
2101 Creek Top Way  
North Chesterfield, VA 23236  
*Individually and as Registered Agent for  
Empowerment Clinical & Consulting  
Services, LLC*

And served, via regular first class mail, a copy the foregoing to the following:

Rudi Jackson  
2101 Creek Top Way  
North Chesterfield, VA 23236

Audrey Campbell  
5100 Glenbeigh Drive  
Richmond, Virginia 23234

/s/ Carrie M. Harris

Carrie M. Harris (VSB #76817)

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